



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

Judy Y. Lee, Esq.  
Massachusetts Electric Company  
25 Research Drive  
Westborough, MA 01582

BY FAX AND U.S. MAIL

RE: Petition of Towns of Franklin and Swampscott, D.T.E. 03-98

February 2, 2004

Dear Ms. Lee:

Enclosed please find the Department of Telecommunication and Energy's second set of information requests on the above-captioned matter. Responses should be filed on or before February 6, 2004. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.  
Hearing Officer

Staff as assigned  
Service list  
Encl.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
MASSACHUSETTS ELECTRIC COMPANY, D.T.E. 03-98

Pursuant to G.L.c.164, ' 34A, the Department of Telecommunications and Energy ("Department") hereby submits to Massachusetts Electric Company the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Massachusetts Electric Company in this proceeding.

1. "Company" or "MECo" means Massachusetts Electric Company and Nantucket Electric Company, its officers, directors, employees, consultants, and attorneys.
2. "Towns" means the towns of Franklin and Swampscott
3. "Petition" means the petition for dispute resolution filed by the Towns of Franklin and Swampscott, pursuant to G.L. c. 164, § 34A, to resolve a dispute between the Towns and Massachusetts Electric Company and Nantucket Electric Company, filed on October 17, 20003.
4. "MECo Response" means the November 10, 2003 Answer of Massachusetts Electric Company, pursuant to 220 C.M.R. § 1.04(2), to the Petition for dispute resolution by the Towns.
5. "FERC" means the Federal Energy Regulatory Commission.
6. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
7. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
8. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

## Second Set of Department Information Requests

9. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
10. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
11. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
12. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Jody Stiefel, Legal Division; (3) James Byrnes, Rates and Revenues Requirements Division; (4) Joseph Passaggio, Rates and Revenues Requirements Division; and (5) Sean Hanley, Rates and Revenues Requirements Division. In addition to filing, please submit responses by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to [william.stevens@state.ma.us](mailto:william.stevens@state.ma.us).

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
MASSACHUSETTS ELECTRIC COMPANY, D.T.E. 03-98

Pursuant to G.L.c.164, ' 34A, the Department of Telecommunications and Energy("Department") hereby submits to Massachusetts Electric Company the following information requests with respect to the above captioned matter.

- DTE 2-1      Reference response to Information Request DTE 1-1, Att. 1, at 26 of 26, column d, and response to Information Request DTE 1-4. Please provide a copy of all FERC Form 1 reports that MECo used to compile the depreciation rates found in the response to Information Request DTE 1-1, Attachment 1, page 26 of 26, column d. Please explain in detail how MECo determined depreciation rates specific to streetlights based upon the FERC Form 1 reports. Please provide a copy of all other sources that were used to determine the depreciation rates.
- DTE 2-2      Reference response to Information Request DTE 1-1, Attachment 1, page 5 of 26. Please provide alternative allocators that may be used to determine how much of the streetlight costs are from the Towns. Provide the results and supporting workpapers using the number of lights rather than revenue as the allocation factor. Is the Company aware of an allocator that may be used that would factor in the vintage of the streetlights to be purchased? If yes, please provide the results of using the allocator along with all supporting documents and workpapers.